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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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Federal Communications Commission  
Office of Secretary

In the Matter of

Amendment of Section 73.202(b) )  
Table of Allotments ) MB Docket No. 05-17  
FM Broadcast Stations ) RM-11113  
(Connersville, Madison, and Richmond, ) RM-11114  
Indiana, Erlanger, Lebanon, Lebanon Junction, )  
New Haven, and Springfield, Kentucky, )  
and Norwood, Ohio) )

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To: Office of the Secretary  
Attn: Assistant Chief, Media Bureau

**REPLY COMMENTS AND REQUEST TO SEVER**

Rodgers Broadcasting Corporation ("RBC"), licensee of Station WIFE(FM), Connersville, Indiana, by its counsel, files its reply comments in the above-captioned proceeding.<sup>1</sup>

1. RBC's petition requested a change in the community of license of WIFE from Connersville to Norwood, Ohio. In order to accomplish that change, RBC requested several other allotment changes, including the substitution of Channel 265A for 265C3 at Lebanon, Kentucky at a new transmitter site for Station WLSK. RBC secured the consent of the Lebanon licensee, CBC of Marion County, Inc. ("Marion") to the change.

2. Marion and several other co-owned entities filed their own petition for rule making, which was consolidated with RBC's petition in this proceeding. Marion's petition requested the same channel substitution for WLSK at the same transmitter site, but with a new community of license, Springfield, Kentucky.

<sup>1</sup> RBC opposes the acceptance of the "counterproposal" advanced by Hoosier Public Radio Corporation ("HPR") and Indiana Community Radio Corporation ("ICRC") in this proceeding. Its comments addressing the pleadings filed by those parties are filed separately, as is its reply to Blue Chip Broadcasting Licenses II, Ltd.'s Response to Order to Show Cause.

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3. On the comment deadline, Marion and the other co-petitioners submitted an amended proposal. The amended proposal accommodates a change to a station owned by Cumulus Licensing, LLC ("Cumulus"), which joined the other co-petitioners (collectively referred to as the "Joint Petitioners"). The amended proposal requests the same change at Lebanon, Kentucky, namely, the substitution of Channel 265A for 265C3 at Lebanon, and the relocation of Channel 265A from Lebanon to Springfield. Recognizing that the Commission was procedurally precluded from considering the amended proposal in this proceeding, the Joint Petitioners requested that the Commission issue a new Notice of Proposed Rule Making soliciting comments on the amended proposal and commence a new docketed proceeding.

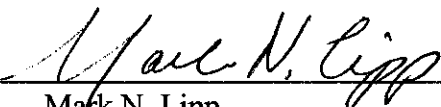
4. RBC agrees with the Joint Petitioners that their proposal should be severed from this proceeding, and urges the Commission to do so. The Joint Petitioners' proposal has no impact on the grantability of RBC's proposal, and the two should not be tied together. RBC and the Joint Petitioners agree on a channel and site for WLSK, and as their respective engineering submissions demonstrate, the station can serve either Lebanon or Springfield using the identical facilities. From RBC's perspective, it does not matter to which community the station is assigned. However, it does matter to RBC that it not be made to wait for another Notice of Proposed Rule Making to have its proposal considered by the Commission.

5. Accordingly, the Commission should proceed with as much speed as possible to process and grant the RBC proposal in this proceeding, while it solicits additional comments on the Joint Petitioners' proposal in a separate proceeding. In granting RBC's proposal, it should substitute Channel 265A for 265C3 at Lebanon, Kentucky as RBC requested and Marion agreed. When and if the Joint Petitioners' proposal is granted, it can then delete channel 265A at Lebanon and allot 265A at Springfield as requested therein.

6. Under no circumstances should the Commission place RBC's proposal on a second public notice. Comments have already been solicited on the proposal, and it is ripe for processing and grant. Moreover, it has already been subjected to an egregiously long period of more than a year from date of filing to notice of proposed rule making. The public will benefit greatly from the expeditious grant of RBC's proposal. Norwood will receive a first local service and an additional 1,091,252 people will receive new radio service. Eight preexisting short spacings will be eliminated and one substantially reduced. It would not serve the public interest to delay the benefits of the RBC proposal merely in order for the Commission to fulfill its due process requirements with respect to the Joint Petitioners' proposal.

Respectfully Submitted,

RODGERS BROADCASTING CORPORATION

By: 

Mark N. Lipp  
J. Thomas Nolan  
Vinson & Elkins, LLP  
1455 Pennsylvania Avenue, N.W.  
Washington, DC 20004  
(202) 639-6500

Its Counsel

April 5, 2005

**CERTIFICATE OF SERVICE**

I, Andrea Brown, of the law firm of Vinson & Elkins, do hereby certify that on this 5th day of April, 2005, I caused a copy of the foregoing "Reply Comments and Request to Sever" to be sent via first-class mail, postage prepaid, to the following:

Richard J. Bodorff  
Gregory L. Masters  
Wiley, Rein & Fielding LLP  
1776 K Street, NW  
Washington, D.C. 20006  
(Counsel to Blue Chip Broadcasting Licenses II, Ltd.)

John Garziglia  
Womble Carlyle Sandridge & Rice, PLLC  
1401 Eye Street, N.W.  
Washington, D.C. 20005  
(Counsel to CBC of Marion County et al.)

Martin L. Hensley  
Hoosier Public Radio Corporation  
15 Wood Street  
Greenfield, Indiana 46140

Jennifer Cox-Hensley  
Indiana Community Radio Corporation  
15 Wood Street  
Greenfield, Indiana 46140

A handwritten signature in black ink, appearing to read "Andrea Brown", written over a horizontal line.

Andrea Brown